

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RAYMOND A. JOAO,

Plaintiff,

v.

EPIC SYSTEMS CORPORATION,

Defendant.

Case No. 1:25-cv-00857-JMF

**NOTICE OF MOTION TO TRANSFER VENUE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Bryce A. Loken, and accompanying exhibits, and all other papers and proceedings herein, Defendant Epic Systems Corporation, respectfully moves this Court for an Order transferring this case to the United States District Court for the Southern District of Florida pursuant to the first-to-file rule and 28 U.S.C. § 1404(a), and granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 5th day of February, 2025.

/s/ Bryce A. Loken

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Matthew J. Duchemin (*Pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2025, I caused to be electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record.

/s/ Bryce A. Loken  
Bryce A. Loken